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17 Attorneys for Plaintiffs Philip and Karen Wingen

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25 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

26 PHILIP WINGEN, et al.

27 Plaintiffs,

28 v.

29 VENTRUM ENERGY CORP., et al.

30 Defendants.

31 Case No. 2:15-cv-02043-JCM-(VCF)

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40 **JOINT REQUEST FOR EXTENSION OF**
TIME TO FILE THE JOINT PRE-TRIAL
ORDER
(First Request)
AND ORDER

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45 **JOINT REQUEST FOR EXTENION OF TIME TO FILE JOINT PRE-TRIAL ORDER**
(First Request)

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50 WHEREAS the Discovery Plan and Scheduling Order in this matter (ECF No. 134)
51 requires the parties to file a Joint Pretrial Order within “30 days after the decision of the
52 dispositive motions or until further order of the Court” (*Id.* at 2:2-3); and

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57 WHEREAS Defendants Fossil Energy, Inc.; West Salt Creek, Inc.; Montgomery George,
58 Paul Grady, William Sturdevant, and Tari Vickery (“Fossil Defendants”) by and through their
59 attorney Nikola Skrinjaric, Esq., filed a Motion for Summary Judgment on May 2, 2018, which

1 Plaintiffs opposed and to which Opposition the Fossil Defendants Replied on June 7, 2018; and
2 WHEREAS the Court entered its decision in the Fossil Defendants' Motion for Summary
3 Judgment on November 16, 2018; making the due date for the Joint Pretrial Order December 17,
4 2018;

5 WHEREAS, Counsel for the Fossil Defendants, Nikola Skinjaric is unavailable and will
6 be out of the country until December 10, 2018 which plans were made before the filing of the
7 Court's decision on November 16, 2018; and

8 WHEREAS, Counsel *pro hac vice* for the Plaintiffs is getting married December 9, 2018
9 and will be unavailable the week of December 10-14, 2018 and the plans for the wedding were
10 set before the filing of the Court's decision on November 16, 2018; and

11 WHEREAS, all other parties have either been dismissed or are subject to a clerk's default
12 and no other party will be participating in crafting the Joint Pretrial Order;

13 NOW THEREFORE, Plaintiffs and the Fossil Defendants, by and through their counsels,
14 jointly request that the Court extend the deadline for filing the Joint Pretrial Order until January 3,
15 2019.

16 Dated this 26th day of November, 2018.

17 /s/ Fara Daun
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22 Attorney for Defendants, Paul Grady,
23 Montgomery George, Fossil Energy, Inc.,
24 West Salt Creek, Inc., William Sturdevant,
25 and Tari Vickery

1 Attorneys for Plaintiffs Phillip and Karen
2 Wingen

3 **ORDER**

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5 It is hereby ordered that the time for the Parties to file the Joint Pre-Trial Order shall be
6 extended up to and including January 3, 2019.

7 Dated this 27th day of November, 2018.

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10 UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I certify on this 26rd day of November, 2018, I caused a copy of this Joint Request For Extension Of Time To File Joint Pretrial Order and Order to be served via ECF on all counsel of record.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE
BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS
MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR
PERJURY.

Executed this 26th day of November, 2018, in Lynnwood, Washington.

STELLAR PACIFIC BUSINESS LAW PLLC

By /s/ Fara Daun

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Of Attorneys for Plaintiffs Phillip and Karen
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